



भारत सरकार Government of India
खान मंत्रालय Ministry of Mines
भारतीय खान ब्यूरो Indian Bureau of Mines
क्षेत्रीय खान नियंत्रक का कार्यालय Office of the Regional Controller of Mines
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फाईल संख्या File No: 614(2)/MS-B-171/08-DDN

देहरादून, दिनांक 12-02-2021

सेवा में/ To : श्री पंकाज पाण्डे,

e-mail:sahajsahyog990@gmail.com

मैसर्स सहज सहयोग कंसल्टेंट प्राइवेट लिमिटेड, B-1/21, Sec.-B

अलीगंज, लखनऊ – यू।पी।

Shri Pankaj Pande,

M/s Sahaj Sahyog Consultants (P) Ltd, B-1/21, Sec.-B,

Aliganj, Lucknow-U.P

विषय/Sub : Submission of Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Punzoo Limestone Mine, M/s Baghdad Minerals, Mining lease over an area of 3.13 hectares located near Village-Punzoo, Tehsil-Doru, District-Ananthnag, Jammu & Kashmir-U.T submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017

संदर्भ/Ref. : Letter from Mining lease holder vide No.Nil dated 12.01.2021 received this office dated 27.01.2021

महोदय/ Sir,

This office is in receipt of two copies of the above-mentioned draft Review and Updation of Mining Plan including Progressive Mine Closure Plan, hereinafter refer as RMP, on 27.01.2021. The same has been examined and found incomplete and incorrect. Various discrepancies/deficiencies/in-consistencies/gaps were observed which has been listed in enclosure to this letter as **scrutiny comments**. One copy of RMP has been forwarded to the **State DMG**, in case receipt of any comments from them the same shall be communicated to you subsequently. **U.T**

You are advised to correct the submitted intial/draft RMP by addressing the incomplete details /information/inconsistencies/discrepancies/deficiencies appropriately and carry out necessary/required modifications and submit the mining plan afresh in **3 fair copies** within **15 days** from the date of issue of this letter in hard bound copies (no spiral binding) along with checklist (changes made scrutiny point wise). Also submit two CDs containing entire RMP i.e. text, plates, annexures, cover letter of final submission and checklist etc. In case if any other changes made in the RMP other than scrutiny comments, the details and reason/justification for doing so shall be given along with page numbers/plate no/annexure no. etc. You are advised to prepare the fair copies carefully and ensure that it is correct in all respect and submitted to this office within stipulated time. It is also advised to use both side paper to best possible extent, also optimize the use of drawing paper used in plates.

If the afresh/fair copies of Review and Updation of Mining Plan including Progressive Mine Closure Plan not received at this office within stipulated time then final action will be taken appropriately. Further if again deficiencies are observed then final action will be taken by this office without returning the copies for correction. This issues with the approval of competent authority

Encl: as above.

भवदीय Yours faithfully,

12.02.2021

(दामोदर प्रसाद शर्मा / D. P. Sharma)

सहायक खान नियंत्रक /Assistant Controller of Mines

प्रतिलिपि सूचनार्थ प्रेषित :-

1-खान नियंत्रक (उत्तर), भारतीय खान ब्यूरो, उदयपुर। (zo.udaiapur@ibm.gov.in)

2- Mr. Gulam Ahmad Shah, Village-Kurigam Qazigund, Tehsil-Doru, Distrcet-Ananthnag -192230(J&K-U.T)
(gulamahmed88@gmail.com)

सहायक खान नियंत्रक /Assistant Controller of Mines

Scrutiny comments, indicating incomplete details /information/inconsistencies / deficiencies etc in initially/draft submitted Review of Mining Plan with Progressive Mine Closures Plan (PMCP) including supporting documents of Punzoo Limestone Mine, M/s Baghdad Minerals, Mining lease over an area of 3.13 hectares located near Village-Punzoo, Tehsil-Doru, District-Ananthnag, Jammu & Kashmir-U.T submitted under Rule 17(2) of M (OAHCEM)CR 2016 & 23 of MCDR 2017 for the period of 2021-22 to 2022-23.

- 1) Lease period is not matching with previous approved plan's enclosed lease deed with draft/initial submitted plan's enclosed lease deed.
- 2) Cover page:
 - a. ML No. if any shall be mentioned beside Mine Name.
 - b. Review & Updation of Mining Plan along with PMCP shall be prepared for 5 year period.
 - c. Name of proprietor (lease representative) is not correct with respect to lease deed and identity proof.
- 3) Lapse period and activities during this lapse period shall also be covered in this review and updation of mining plan.
- 4) Draft/Initially submitted Review and Updation of Mining plan with PMCP is not as per Standard prescribed format adhering on Para, sub-Para, devised table are essential for consideration of document for approval and document is grossly deviating ensuring proper documents for systematic mining proposal for mineral conservation and environment protection guidelines issued by IBM.
- 5) On Page No.3, Annexure no.5 is not evidenced as stated.
- 6) On Page No.4, given Boundary pillar coordinates(authenticated) are not matching with previously approved mining plan, and according the excavation along boundary may have impacts, else excavation outside lease area.
- 7) On Page No.6, Para 5.14, Plantation proposals and implementation are not correct and it seems production details are repeated in this Para which shall be corrected.
- 8) On Page No.6, Para 5.15, Irrelevant information is given in actual work done with respect to control of ground vibration, dust & noise which needs to be reviewed.
- 9) On Page No.6, Para 5.17, Irrelevant information with respect to compliance on violations pointed have been given which needs to be reviewed.
- 10) Review w.r.t previous mining plan is not done and is not correct/factual.
- 11) On Page No.12, Para 6.4.2 and 6.4.3, There contradictory/mismatching statements about 2 bore holes in the above Paras, which needs correction.
- 12) Page No.14, 20, 22 & Cover Page, there are mismatching statements w.r.t mining operations by means of manual or mechanized.
- 13) On Page No.16, it is to be explained appropriately that how the total reserves (proved and probable reserves) drastically decreased and when compared to previous approved Scheme of Mining. Review the reserves along with prepare Surface geological plan & sections accordingly.
- 14) Area have been still considered under G3axis to be explored fully as per rule 12(4a) of MCDR, 2017 (exploration shall be converted into G1 axis).
- 15) On Page No.20, Document is prepared for the years 2021-22 and 2022-23 whereas exploration is proposed for 2020-21.
- 16) On Page No.23, over all pit slope is not realistic in respect of mine topography and considering factor of safety with respect to nearby habitant which shall be reviewed.
- 17) On Page No.29, Para 7.18 Conceptual planning is not as per IBM guidelines. Please incorporate all the details with respect to conceptual planning as per IBM guidelines.
- 18) On Page No.35, Para 12.7, details on water consumption on daily basis in a mine shall be given.
- 19) On Page No.37, Rule under MCDR 2017 is not provided under chapter heading
- 20) On Page No.46, net area put to use area is less than previous approved scheme of mining.

- 21) On evidence of .kml of mining lease, some excavation is observed towards south direction near boundary line A, which is not correct.
- 22) Bio-fencing may be included/explored appropriately.
- 23) Revenue plan in legible form along with its soft scanned copy shall also be submitted.
- 24) Adequate mitigative measures shall be proposed to arrest the roll down material/muck/boulders/mine-waste/seepage water into gorge as evidence of natural slope heading towards west direction as per mine topography. More importantly habitant is evidenced less than 300m from proposed working whereas SOP for blasting as per DGMS guidelines shall be provided.
- 25) As per the Hon'ble Supreme Court of India order dated 08/01/2020, re-grassing of mined out area to be carried out. Accordingly, proposals may be furnished for restoration/reclamation/re-grassing of mined out area.
- 26) No proposal for Ground Vibration is given
- 27) Financial Assurance need to be calculated afresh w.r.t changed land use/area put to use.
- 28) PMCP is not in order to protect the environment of area.

Annexure:

- 29) In Consent Letter, signature and name of lease representative (proprietor) is differed from previous approved scheme of Mining.

Plates:

- 30) Authentic lease plan shall be the basis for the preparation of all the plans and sections. There should not be any deviations in all the plans and sections with respect to configuration given in the lease plan.
- 31) Lessee shall be responsible for precise superimposition of authentic lease plan is to be carried out before preparation of all the plans and sections. Lessee shall also be responsible for authentication of geo-referenced lease coordinates.
- 32) Contours are not matched to scale in all provided plates.
- 33) Surface Plan, Plate No.3:
 - a. Three Ground Control Points are not demarcated.
 - b. All existing features shall be properly addressed.
 - c. Excavation is evidenced beyond 7.5m statutory boundary pillar at Boundary Pillar No. A
- 34) Surface Geological Plan, Plate No.4:
 - a. UNFC code & Geological Axis of exploration shall be clearly demarcated and colored separately which is not evidenced in the plate.
 - b. UNFC code shall be provided at proposed drilling bore-holes.
- 35) Sections for Surface Geological Plan, Plate No. 5:
 - a. All the sections are not matching in line with UNFC code in SGP, Plate no.4
 - b. Projection of bore holes invariably be shown in dashed lines/strings over nearest section lines
- 36) Development plans and section, Plate No. 6-7:
 - a. Bench formation shall be demarcated with contour line which is the reference to find bench height.
 - b. Excavation is evidenced outside the statutory boundary near boundary pillar No. B
 - c. Land use shall be provided.
 - d. Arrestors like parapet wall/retaining wall shall be proposed keeping in view of habitat.
- 37) Conceptual plan, Plate No. 08:
 - a. Conceptual plan is not matching with the commentary in the text.
 - b. Conceptual Sections do not match with Conceptual Plan w.r.t no. of benches, bed and features.
 - c. Adequate sections of conceptual plan showing UPL are not given.
 - d. Existing ground profile shall be given in section
- 38) Reclamation Plan, Plate No.09:
 - a. Proposed configuration of pit shall also be the part of PMCP. Thus utmost care is to be taken while preparing PMCP proposals and its implementation in its plan and sections.
 - b. Predominant wind direction is not shown.
- 39) Environment Plan, Plate No.13:
 - a. Environment Plan is not as per Rule 32(5)(b) of MCDR 2017,
 - b. Boundary line is sharing with other mining lease which is not discussed in text.

Other Scrutiny Points:

- 40) The mine is located in hill slope of the high altitude mountainous terrain susceptible for seismic, other ground movement and natural slope is towards habitant which is located within the core zone (60meters). Hence adequate proposals should also be incorporated in the document like controlled blasting techniques, erecting adequate retaining walls, check dams, parapet walls to ensure safe, secure and systematic mining for ensuing long term period. Proposals shall be incorporated appropriately so that the adjacent environment, flora, fauna, public in villages shall not be affected by roll-down of any boulder/material or any other material etc from mine as habitant is extreme close to lower level of lease boundary.
- 41) Proposals for development of pit through proper benching in particular at the end of plan period years and also at lease expiry period shall be considered as proper closure activities as leaving steep and extra height benches would be detrimental to the Environment. Proposals for development of benches during plan period shall be envisioned by keeping in view of PMCP proposals (reclamation / rehabilitation / restoration /afforestation in mined out area)
- 42) Design of pits, benches & excavation shall be in such a manner that the roll down material from mine towards low lying areas especially towards habitation, public roads/rail/river etc be trapped/arrested appropriately.
- 43) The sufficient number of colored photographs of the area showing existing status of the lease area, benches, boundary pillars, mines office, etc may be submitted with proper captions
- 44) All the proposals should be made within ML only.
- 45) All the plates should be verified by Surveyor, for their authenticity and certificate to be given in each plate and also to certify that prepared plans and sections are based on the lease map authenticated by the State Govt.
- 46) All the annexure should be attested by qualified person for their authenticity.
- 47) Additional comments shall also be communicated to you in case of receipt of comments from State government if any.
- 48) There are several typographical mistakes which required to be corrected.
- 49) Two CDs covering the entire document and plans should be enclosed at the time of final submission .Undertaking in this regard by qualified person should be given that the CD contains the same text & plates as submitted in hard copy. KML file shall also be submitted along with final submission.
- 50) Note: All the corrections mentioned in the text and plates shall also be attended invariably

